

**Comments on FCC Proposed Rulemaking
Rural Health Care Support Mechanism
WC Docket No. 02-60
February 10, 2004**

**Submitted by: California State Rural Health Association
2000 L. Street, #100, Sacramento, California**

On behalf of the California State Rural Health Association, we are writing to provide a recommendation to the FCC's proposed rulemaking on the definition of rural. Below is our recommendation:

- Definition of rural. The members of California State Rural Health Association recommend that the FCC make the following modifications to the definition of "rural area" for the rural health care universal service support mechanism:
 - 1) Instead of using a national definition of rural (such as RUCA), the FCC should allow for state-definitions of rural that have been recognized by another federal agency. This ensures that the Universal Service program will be responsive to the unique characteristics of the many rural communities within our 50 states, while maintaining a minimum amount of federal oversight.
 - 2) If a state does not have a definition of rural recognized by a federal agency, allow organizations to define themselves as rural using the definitions of any federal program, such as the Office of Rural Health Policy or the US Department of Agriculture. This flexibility will overcome the limitations of a "one-size fits all" approach to rural definitions and allow the maximum number of rural communities to benefit from this program.
 - 3) If the FCC chooses to develop a single, national definition for its program, then it should develop a process that enables organizations to appeal their exclusion as being rural under the FCC definition by demonstrating they are rural under another federal definition or a state process that has been recognized by a federal agency. Instituting this type of an appeal process will provide maximum opportunity for rural communities to demonstrate that they are rural. The USAC staff should manage this appeal process so it can respond in a timely manner to organizations seeking an appeal.
 - 4) Regardless of which definitions the FCC selects, organizations that are currently eligible for the program should be grandfathered so that existing services are not disrupted.
- Streamlining USAC process.
 - 1) CSRHA recommend that the FCC adopt a simplified annual process recertification. This will reduce the burden of applying for this program and maximize participation by rural health organizations.

CSRHA believes the policy goal of the Rural Health Care Universal Service program is to expand the benefits of advanced telecommunications to the nation's rural communities, which is very worthwhile. This policy goal is not achieved if the Commission narrows the definition of rural to exclude communities who deserve to benefit from the program, such as those in California based on a definition of rural that does not recognize the uniqueness of the state. Therefore, when approach the

question of who is rural, we urge the FCC to use as liberal approach as possible – one that acknowledges the diversity and complexity of rural and serves to broaden, not limit, participation in the program.

Thank you for your consideration and we would be pleased to provide additional assistance if appropriate.

Sincerely,

Lauri Medeiros
Executive Director